

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

michael@faillacelaw.com

February 2, 2021

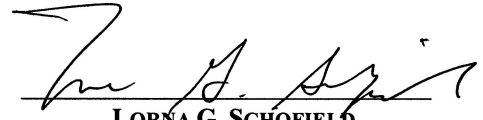
VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
40 Foley Square
New York, NY 10007

This application is GRANTED. Plaintiff's deadline to file default judgment materials is extended to **February 19, 2021**. The February 18, 2021, initial pretrial conference is adjourned *sine die*.

SO ORDERED.

Dated: February 3, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: **20-cv-09152, Lara v. J and Z Food Mart**

Your Honor:

This firm represents Plaintiff Jorge Lara in the above referenced matter. We write to respectfully request an extension of time to file our default motion in this matter. The motion is currently due on February 5, 2021. This is the first request of its kind.

We are working diligently on the default motion. However, we will need some additional time to finalize the motion and file it. As such, we respectfully request a fourteen-day extension to file the motion.

We thank the Court for its time and attention in this matter.

Respectfully Submitted,

/s/ Michael Faillace
Michael Faillace, Esq.